

1
2
3
4
5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
7 AT SEATTLE

8 Case No.: 18-cv-00910 RSM

9 CITY OF ISSAQUAH, a municipal
10 corporation,

11 Plaintiff,

12 v.

13 ORA TALUS 90, LLC, a Delaware limited
14 liability company; and RESMARK EQUITY
15 PARTNERS, LLC, a Delaware limited
16 liability
17 company

18 Defendant.

19 **STIPULATED MOTION AND ORDER**
20 **TO EXTEND CERTAIN DEADLINES**

21 In order to conserve resources, accommodate an imminent scheduling conflict¹, and to
22 facilitate the orderly management of this case, the parties respectfully submit this joint request
23 for an Order to Extend Certain Deadlines pursuant to LCR 16(b)(5).
24

25 Counsel for the defendants have advised plaintiff's counsel of their intent to file an
26 amended answer and counterclaim and to bring additional parties into the case by way of a
27 third-party complaint and as additional defendants on the counterclaim. Based upon the
28

29
30
31
32
33
34
¹ Plaintiff's counsel has agreed to the request which arises in part from Defendants' counsel's pre-existing conflicts in other matters, including an appellate filing and a complex mediation and briefing.

1 existing deadlines and other obligations, the parties jointly request that the Court extend certain
2 of the case deadlines, which will allow the parties to conduct the Rule 26(f) conference, serve
3 Initial Disclosures, and submit a Joint Status Report once all parties have appeared in the case.

4 Accordingly, the parties seek extension of the following deadlines:

5 **Service of Summons and Complaint on a Nonparty by Defendants**

6 Current deadline: August 6, 2018 (*see* Fed. R. Civ. P. 14(a)(1))

7 Requested deadline: September 6, 2018

8
9 **Service and Filing of an Amended Answer and Counterclaim by Defendants**

10 Current deadline: August 13, 2018 (*see* Fed. R. Civ. P. 15(a)(1))

11 Requested deadline: September 6, 2018

12
13 **Fed. R. Civ. P. 26(f) Conference**

14 Current deadline: August 3, 2018 (*see* Dkt. # 7)

15 Requested deadline: September 20, 2018

16
17 **Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)**

18 Current deadline: August 10, 2018 (*see* Dkt. # 7)

19 Requested deadline: September 27, 2018

20
21 **Combined Joint Status Report and Discovery Plan as Required by Fed. R. Civ. P.
22 26(f) and Local Civil Rule 26(f)**

23 Current deadline: August 3, 2018 (*see* Dkt. # 7)

24 Requested deadline: September 20, 2018

The parties respectfully request the foregoing relief.

DATED this 1st day of August, 2018

SKELLENGER BENDER, P.S.

HARRIGAN LEYH FARMER & THOMSEN LLP

By: s/Terence J. Scanlan

By: s/Arthur W. Harrigan, Jr.

By: s/Patricia A. Robert

By: s/Tyler L. Farmer

Terence J. Scanlan, WSBA #19498

By: s/Kristin E. Ballinger

Patricia A. Robert, WSBA # 46716

Arthur W. Harrigan, Jr. WSBA #1751

1301 – 5th Avenue, Suite 3401

Tyler L. Farmer, WSBA #39912

Seattle, WA 98101-2605

Kristin E. Ballinger, WSBA #28253

Telephone: 206-623-6501

999 Third Avenue, Suite 4400

Facsimile: 206-447-1973

Seattle, WA 98104

Email:

Telephone: (206) 623-1700

tscanlan@skellengerbender.com

Facsimile: (206) 623-8717

Email:

Email: arthurh@harriganleyh.com

probert@skellengerbender.com

Email: tylerf@harriganleyh.com

Email: kristinb@harriganleyh.com

Attorneys for Plaintiff City of Issaquah

GLASER WEIL FINK HOWARD AVCHEN &
SHAPIRO LLP

By: s/Cynthia M. Cohen

Cynthia M. Cohen, Admitted Pro Hac Vice

333 S. Hope Street, Suite 2610

Los Angeles, CA 90071

Telephone: (310) 553-3000

Facsimile: (310) 556-2920

Email: ccohen@glaserweil.com

Attorneys for Defendants ORA Talus 90, LLC and
Resmark Equity Partners, LLC

ORDER

IT IS SO ORDERED.

DATED this 2nd day of August, 2018.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

SKELLENGER BENDER, P.S.

By: s/Terence J. Scanlan

By: s/Patricia A. Robert

Terence J. Scanlan, WSBA #19498

Patricia A. Robert, WSBA # 46716

1301 – 5th Avenue, Suite 3401

Seattle, WA 98101-2605

Telephone: 206-623-6501

Facsimile: 206-447-1973

Email:

tscanlan@skellengerbender.com

Email:

probert@skellengerbender.com

Attorneys for Plaintiff City of Issaquah

HARRIGAN LEYH FARMER & THOMSEN LLP

By: s/Arthur W. Harrigan, Jr.

By: s/Tyler L. Farmer

By: s/Kristin E. Ballinger

Arthur W. Harrigan, Jr. WSBA #1751

Tyler L. Farmer, WSBA #39912

Kristin E. Ballinger, WSBA #28253

999 Third Avenue, Suite 4400

Seattle, WA 98104

Telephone: (206) 623-1700

Facsimile: (206) 623-8717

Email: arthurh@harriganleyh.com

Email: tylerf@harriganleyh.com

Email: kristinb@harriganleyh.com

GLASER WEIL FINK HOWARD AVCHEN &
SHAPIRO LLP

By: s/Cynthia M. Cohen

Cynthia M. Cohen, Admitted Pro Hac Vice

333 S. Hope Street, Suite 2610

Los Angeles, CA 90071

Telephone: (310) 553-3000

Facsimile: (310) 556-2920

Email: ccohen@glaserweil.com

Attorneys for Defendants ORA Talus 90, LLC and
Resmark Equity Partners, LLC